

EXHIBIT “C”

DC-21-04367

CAUSE NO. _____	
TROY MONTGOMERY, Plaintiff,	IN THE DISTRICT COURT
v.	116th
BRIAN HUNT AND KLLM TRANSPORT SERVICES, LLC, Defendants.	_____ JUDICIAL DISTRICT
	DALLAS COUNTY, TEXAS

PLAINTIFF'S ORIGINAL PETITION AND REQUEST FOR DISCLOSURES

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, TROY MONTGOMERY, Plaintiff, and files Plaintiff's Original Petition, complaining of BRIAN HUNT AND KLLM TRANSPORT SERVICES, LLC, Defendants, and would show unto the Court as follows:

I. DISCOVERY PLAN

1. This suit is governed by discovery control plan II under Rule 190.3 of the Texas Rules of Civil Procedure.

II. PARTIES

2. Plaintiff, TROY MONTGOMERY, is an individual who resides at 1104 Rio Vista Drive., DeSoto, Dallas County, Texas TX 75115.

3. Defendant, BRIAN HUNT, is an individual who resides at 1 Pinecrest Drive, Fairmont, Robeson County, NC 28340, and may be served with process at that address. Citation is requested for this Defendant and service will be completed by a private process server.

4. Upon information and belief, Defendant, KLLM TRANSPORT SERVICES, LLC is a Texas corporation that may be served with process through its registered agent for service, C T Corporation System, at 1999 Bryan Street Suite 900, Dallas, TX 75201. Citation is requested for this Defendant and service will be completed by a private process server.

III. JURISDICTION & VENUE

5. The Court has continuing jurisdiction over Defendants, because Defendant, Brian Hunt, committed a tort within the State of Texas, and Defendant, KLLM Transport Services, LLC, maintains substantial and continuing contacts with the State of Texas. The Court has jurisdiction over the controversy, because the damages are within the statutory jurisdictional limits of the Court.

6. Venue is proper in Dallas County, Texas, because all or a substantial part of the events or omissions giving rise to the claim occurred in Dallas County.

IV. FACTS

7. This lawsuit results from an automobile collision that occurred on or about July 14, 2019, at Interstate Highway 20 in Dallas, Dallas County, Texas. Plaintiff, Troy Montgomery, was a passenger in a vehicle traveling eastbound on Interstate Highway 20. Defendant, Brian Hunt, was traveling eastbound on Interstate Highway 20 in the lane adjacent from Plaintiff's vehicle. Defendant, Brian Hunt, failed to merge lanes when safe striking the vehicle Plaintiff was a passenger in. At the time of the collision, Defendant, Brian Hunt, was acting in the course and scope of his employment with Defendant, KLLM Transport Services, LLC. As a result of the impact, Plaintiff suffered bodily injury.

V. NEGLIGENCE

8. Defendant, Brian Hunt, and Defendant, KLLM Transport Services, LLC, vicariously, had a duty to exercise ordinary care and operate the vehicle reasonably and prudently and failed to do so. Defendants were negligent in at least the following respects:

- a. Failure to maintain a proper lookout;
- b. Failure to make such application of the brakes as a person using ordinary care would have made;
- c. Failure to maintain proper control of the vehicle under the conditions then and there existing;
- d. Failure to turn the vehicle to the right or left to avoid the collision;
- e. Traveling at an unsafe speed; and

- f. Failure to maintain an adequate distance between the vehicle and the vehicle driven by Plaintiff, Troy Montgomery.

VI. RESPONDEAT SUPERIOR

9. At the time of the accident, Defendant, Brian Hunt, was the agent, servant, and employee of Defendant, KLLM Transport Services, LLC, and was acting within the scope of his authority as such agent, servant, and employee. Defendant, KLLM Transport Services, LLC is liable to Plaintiff for the negligence of Defendant, Brian Hunt, under the common law doctrine of *respondeat superior*.

VII. DAMAGES

10. As a proximate result of Defendants' negligence, Plaintiff suffered bodily injury. Plaintiff suffered the following damages:

- a. Physical pain and mental anguish in the past and future;
- b. Medical expenses in the past and future; and
- c. Physical impairment.

VIII. PRAYER

WHEREFORE, PREMISES CONSIDERED, Plaintiff, TROY MONTGOMERY, respectfully requests that Defendants, BRIAN HUNT AND KLLM TRANSPORT SERVICES, LLC, be cited to appear and answer, and on final trial, that Plaintiff have judgment against Defendants for:

- a. Actual damages;
- b. Prejudgment and post-judgment interest as allowed by law;
- c. Costs of suit;
- d. monetary relief over \$250,000 but not more than \$1,000,000; and
- e. Any further relief, either in law or equity, to which Plaintiff is justly entitled..

IX. REQUEST FOR DISCLOSURE

Pursuant Rule 194 of the Texas Rules of Civil Procedure, please disclose all information identified in Rule 194.2 (a) - (l).

Respectfully submitted,

Ben Abbott & Associates, PLLC
1934 Pendleton Drive
Garland, TX 75041
(972) 263-5555
(817) 263-5555
(972) 682-7586 Facsimile
eService@benabbott.com

/s/ James Bauguss III

by: James Bauguss III
State Bar No. 24045463

ATTORNEYS FOR PLAINTIFF

BEN ABBOTT

BEN ABBOTT & ASSOCIATES, PLLC

ATTORNEYS AT LAW

LESLEY HOLLOWAY
Managing Partner

1934 PENDLETON DRIVE
GARLAND, TX 75041
Hours: Monday - Friday, 8am - 5pm

TELEPHONE: (972) 263-5555
(817) 263-5555
PRE-LIT FAX: (214) 635-5949
LIT FAX: (972) 682-7586
eService@benabbott.com

DAVID MALDONADO
JAMES BAUGUSS, III
GRIFFIN SCHEUMACK
JOSHUA HANCOCK
TANICA MANN
ROYEAL FRASIER-LEWIS
THOMAS HENDRIX
CHELSEY WATTS
BLANCA MILAN
ANDREW VRANKOVIC
AMANDA GREEN FRENCH

April 7, 2021

☐ Via E-Filing
Clerk of Court
Dallas County District Clerk
George L. Allen, Sr., Courts Building
600 Commerce Street
Dallas, TX 75202

DC-21-04367

RE: *TROY MONTGOMERY v. BRIAN HUNT AND KLLM TRANSPORT
SERVICES, LLC*

Dear Clerk:

Attached for filing is Plaintiff's Original Petition and Request for Disclosure.
Please file the original in the court's records and issue citations for the following:

BRIAN HUNT

1 Pinecrest Drive, Fairmont, Robeson County, NC 28340

KLLM TRANSPORT SERVICES, LLC

Served with process through its registered agent for service, C T
Corporation System, at 1999 Bryan Street Suite 900, Dallas, TX 75201

There will be no copies of the Plaintiff's Original Petition and Request for
Disclosure provided or requested. Please return the citation(s) to me via email at
eService@benabbott.com.

Electronic fees in the amount of \$308.00 have been submitted to cover costs
relating to filing and/or issuance of citations.

Should you have any questions, please feel free to contact the undersigned.

Regards,



Jennifer Zuniga
Legal Assistant

**FORM NO. 353-3 - CITATION
THE STATE OF TEXAS**

**To: BRIAN HUNT
1 PINECREST DRIVE
FAIRMONT NC 28340**

GREETINGS:

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **116th District Court** at 600 Commerce Street, Ste. 101, Dallas, Texas 75202.

Said Plaintiff being **TROY MONTGOMERY**

Filed in said Court **7th day of April, 2021** against

BRIAN HUNT AND KLLM TRANSPORT SERVICES, LLC

For Suit, said suit being numbered **DC-21-04367**, the nature of which demand is as follows:
Suit on **MOTOR VEHICLE ACCIDENT** etc. as shown on said petition **REQUEST FOR DISCLOSURE**, a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

WITNESS: FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.
Given under my hand and the Seal of said Court at office this 14th day of April, 2021.

ATTEST: FELICIA PITRE, Clerk of the District Courts of Dallas, County, Texas

By T. Daniel Macias, Deputy
DANIEL MACIAS



ESERVE

CITATION

DC-21-04367

**TROY MONTGOMERY
vs.**

BRIAN HUNT, et al

**ISSUED THIS
14th day of April, 2021**

FELICIA PITRE
Clerk District Courts,
Dallas County, Texas

By: **DANIEL MACIAS**, Deputy

Attorney for Plaintiff

JAMES L BAUGUSS, III
BEN ABBOTT AND ASSOCIATES, PLLC
1934 PENDLETON DR
GARLAND TX 75041
972-263-5555
eService@benabbott.com

**DALLAS COUNTY
SERVICE FEES
NOT PAID**

OFFICER'S RETURN

Case No. : DC-21-04367

Court No. 116th District Court

Style: TROY MONTGOMERY

vs.

BRIAN HUNT, et al

Came to hand on the _____ day of _____, 20____, at _____ o'clock _____ M. Executed at _____
within the County of _____ at _____ o'clock _____ M. on the _____ day of _____,
20____, by delivering to the within named _____

each in person, a true copy of this Citation together with the accompanying copy of this pleading, having first endorsed on same date of delivery. The distance actually traveled by
me in serving such process was _____ miles and my fees are as follows: To certify which witness my hand.

For serving Citation	\$ _____	_____
For mileage	\$ _____	of _____ County, _____
For Notary	\$ _____	By _____ Deputy

(Must be verified if served outside the State of Texas.)

Signed and sworn to by the said _____ before me this _____ day of _____, 20____,
to certify which witness my hand and seal of office.

Notary Public _____ County _____

**FORM NO. 353-3 - CITATION
THE STATE OF TEXAS**

To: **KLLM TRANSPORT SERVICES, LLC
SERVING REGISTERED AGENT CT CORPORATION SYSTEM
1999 BRYAN STREET SUITE 900
DALLAS TX 75201**

GREETINGS:

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **116th District Court** at 600 Commerce Street, Ste. 101, Dallas, Texas 75202.

Said Plaintiff being **TROY MONTGOMERY**

Filed in said Court **7th day of April, 2021** against

BRIAN HUNT AND KLLM TRANSPORT SERVICES, LLC

For Suit, said suit being numbered **DC-21-04367**, the nature of which demand is as follows:

Suit on **MOTOR VEHICLE ACCIDENT** etc. as shown on said petition **REQUEST FOR DISCLOSURE**, a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

WITNESS: FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.
Given under my hand and the Seal of said Court at office this 14th day of April, 2021.

ATTEST: FELICIA PITRE, Clerk of the District Courts of Dallas, County, Texas

By , Deputy
DANIEL MACIAS



ESERVE

CITATION

DC-21-04367

TROY MONTGOMERY

vs.

BRIAN HUNT, et al

ISSUED THIS

14th day of April, 2021

FELICIA PITRE

Clerk District Courts,
Dallas County, Texas

By: **DANIEL MACIAS**, Deputy

Attorney for Plaintiff

JAMES L BAUGUSS, III

BEN ABBOTT AND ASSOCIATES, PLLC

1934 PENDLETON DR

GARLAND TX 75041

972-263-5555

eService@benabbott.com

DALLAS COUNTY

SERVICE FEES

NOT PAID

OFFICER'S RETURN

Case No. : DC-21-04367

Court No. 116th District Court

Style: TROY MONTGOMERY

vs.

BRIAN HUNT, et al

Came to hand on the _____ day of _____, 20____, at _____ o'clock _____ M. Executed at _____
within the County of _____ at _____ o'clock _____ M. on the _____ day of _____
20____, by delivering to the within named _____

each in person, a true copy of this Citation together with the accompanying copy of this pleading, having first endorsed on same date of delivery. The distance actually traveled by
me in serving such process was _____ miles and my fees are as follows: To certify which witness my hand.

For serving Citation	\$ _____	_____	_____
For mileage	\$ _____	of _____	County, _____
For Notary	\$ _____	By _____	Deputy _____

(Must be verified if served outside the State of Texas.)

Signed and sworn to by the said _____ before me this _____ day of _____, 20____,
to certify which witness my hand and seal of office.

Notary Public _____ County _____

CAUSE NO. DC-21-04367**TROY MONTGOMERY,****Plaintiff(s),****VS.****BRIAN HUNT AND KLLM
TRANSPORT SERVICES, LLC,****Defendant(s).**§
§
§
§
§
§
§
§
§
§**IN THE DISTRICT COURT****116TH JUDICIAL DISTRICT****DALLAS COUNTY, TEXAS****RETURN OF SERVICE**

Came to my hand on **Friday, April 30, 2021 at 5:54 PM,**
 Executed at: **1 PINECREST DRIVE, FAIRMONT, NC 28340**
 within the county of **ROBESON** at **2:35 PM,** on **Saturday, May 1, 2021,**
 by individually and personally delivering to the within named:

BRIAN HUNT

a true copy of this

CITATION and PLAINTIFF'S ORIGINAL PETITION AND REQUEST FOR DISCLOSURE

having first endorsed thereon the date of the delivery.

BEFORE ME, the undersigned authority, on this day personally appeared **NICOLE HARDIN** who after being duly sworn on oath states: "My name is **NICOLE HARDIN**. I am a person over eighteen (18) years of age and I am competent to make this affidavit. I am a resident of the State of North Carolina. I have personal knowledge of the facts and statements contained in this affidavit and aver that each is true and correct. I am not a party to this suit nor related or affiliated with any herein, and have no interest in the outcome of the suit. I have never been convicted of a felony or of a misdemeanor involving moral turpitude."



By: Nicole Hardin
NICOLE HARDIN - Process Server

Subscribed and Sworn to by **NICOLE HARDIN**, Before Me, the undersigned authority, on this
 _____ day of May, 2021.

Brenda Acquard
 Notary Public in and for the State of North Carolina

**FORM NO. 353-3 - CITATION
THE STATE OF TEXAS**

**To: BRIAN HUNT
1 PINECREST DRIVE
FAIRMONT NC 28340**

GREETINGS:

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **116th District Court** at 600 Commerce Street, Ste. 101, Dallas, Texas 75202.

Said Plaintiff being **TROY MONTGOMERY**

Filed in said Court **7th day of April, 2021** against

BRIAN HUNT AND KLLM TRANSPORT SERVICES, LLC

For Suit, said suit being numbered **DC-21-04367**, the nature of which demand is as follows:

Suit on **MOTOR VEHICLE ACCIDENT** etc. as shown on said petition **REQUEST FOR DISCLOSURE**, a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

WITNESS: FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.

Given under my hand and the Seal of said Court at office this 14th day of April, 2021.

ATTEST: FELICIA PITRE, Clerk of the District Courts of Dallas, County, Texas

By T. Daniel Macias, Deputy
DANIEL MACIAS



ESERVE

CITATION

DC-21-04367

**TROY MONTGOMERY
vs.**

BRIAN HUNT, et al

**ISSUED THIS
14th day of April, 2021**

**FELICIA PITRE
Clerk District Courts,
Dallas County, Texas**

By: DANIEL MACIAS, Deputy

Attorney for Plaintiff

JAMES L BAUGUSS, III

BEN ABBOTT AND ASSOCIATES, PLLC

1934 PENDLETON DR

GARLAND TX 75041

972-263-5555

eService@benabbott.com

DALLAS COUNTY

SERVICE FEES

NOT PAID

OFFICER'S RETURN

Case No. : DC-21-04367

Court No. 116th District Court

Style: TROY MONTGOMERY

vs.

BRIAN HUNT, et al

Came to hand on the _____ day of _____, 20____, at _____ o'clock _____ M. Executed at _____
within the County of _____ at _____ o'clock _____ M. on the _____ day of _____
20____, by delivering to the within named _____

each in person, a true copy of this Citation together with the accompanying copy of this pleading, having first endorsed on same date of delivery. The distance actually traveled by
me in serving such process was _____ miles and my fees are as follows: To certify which witness my hand.

For serving Citation	\$ _____	_____
For mileage	\$ _____	of _____ County. _____
For Notary	\$ _____	By _____ Deputy

(Must be verified if served outside the State of Texas.)

Signed and sworn to by the said _____ before me this _____ day of _____, 20____,
to certify which witness my hand and seal of office.

Notary Public _____ County _____

RETURN / AFFIDAVIT
PROOF / ATTACHED

RETURN / AFFIDAVIT
PROOF / ATTACHED

CAUSE NO. DC-21-04367

TROY MONTGOMERY,

Plaintiff(s),

VS.

BRIAN HUNT AND KLLM TRANSPORT
SERVICES, LLC,

Defendant(s).

IN THE DISTRICT COURT

116TH JUDICIAL DISTRICT

DALLAS COUNTY, TEXAS

RETURN OF SERVICE

Came to my hand on Saturday, May 1, 2021 at 11:47 AM,
Executed at: 1999 BRYAN STREET SUITE 900, DALLAS, TX 75201
within the county of DALLAS at 10:54 AM, on Monday, May 3, 2021,
by delivering to the within named:

KLLM TRANSPORT SERVICES, LLC


By delivering to its Registered Agent, CT CORPORATION SYSTEM
By delivering to its Authorized Agent, TERRI THONGSAVAT
a true copy of this

CITATION and PLAINTIFF'S ORIGINAL PETITION AND REQUEST FOR DISCLOSURE

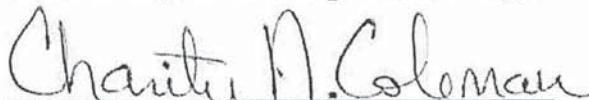
having first endorsed thereon the date of the delivery.

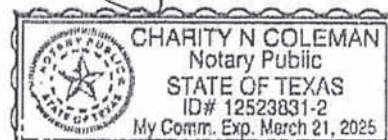
BEFORE ME, the undersigned authority, on this day personally appeared **Ernesto Martin Herrera** who after being duly sworn on oath states: "My name is **Ernesto Martin Herrera**. I am a person not less than eighteen (18) years of age and I am competent to make this oath. I am a resident of the State of Texas. I have personal knowledge of the facts and statements contained herein and aver that each is true and correct. I am not a party to nor related or affiliated with any party to this suit. I have no interest in the outcome of the suit. I have never been convicted of a felony or of a misdemeanor involving moral turpitude. I am familiar with the Texas Rules of Civil Procedure, and the Texas Civil Practice and Remedies Codes as they apply to service of process. I am certified by the Judicial Branch Certification Commission to deliver citations and other notices from any District, County and Justice Courts in and for the State of Texas in compliance with rule 103 and 501.2 of the TRCP."

By:


Ernesto Martin Herrera - PSC 4418 - Exp 11/30/21
served@specialdelivery.com

Subscribed and Sworn to by Ernesto Martin Herrera, Before Me, the undersigned authority, on
this 5th day of May, 2021.


Notary Public in and for the State of Texas



**FORM NO. 353-3 - CITATION
THE STATE OF TEXAS**

**To: KLLM TRANSPORT SERVICES, LLC
SERVING REGISTERED AGENT CT CORPORATION SYSTEM
1999 BRYAN STREET SUITE 900
DALLAS TX 75201**

GREETINGS:

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the 116th District Court at 600 Commerce Street, Ste. 101, Dallas, Texas 75202.

Said Plaintiff being **TROY MONTGOMERY**

Filed in said Court **7th day of April, 2021** against

BRIAN HUNT AND KLLM TRANSPORT SERVICES, LLC

For Suit, said suit being numbered **DC-21-04367**, the nature of which demand is as follows:
Suit on **MOTOR VEHICLE ACCIDENT** etc. as shown on said petition **REQUEST FOR DISCLOSURE**, a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

WITNESS: FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.
Given under my hand and the Seal of said Court at office this 14th day of April, 2021.

ATTEST: FELICIA PITRE, Clerk of the District Courts of Dallas, County, Texas

By , Deputy
DANIEL MACIAS



ESERVE

CITATION

DC-21-04367

TROY MONTGOMERY

vs.

BRIAN HUNT, et al

**ISSUED THIS
14th day of April, 2021**

FELICIA PITRE
Clerk District Courts,
Dallas County, Texas

By: **DANIEL MACIAS**, Deputy

Attorney for Plaintiff
JAMES L BAUGUSS, III
BEN ABBOTT AND ASSOCIATES, PLLC
1934 PENDLETON DR
GARLAND TX 75041
972-263-5555
eService@benabbott.com

**DALLAS COUNTY
SERVICE FEES
NOT PAID**

OFFICER'S RETURN

Case No. : DC-21-04367
Court No. 116th District Court
Style: TROY MONTGOMERY

vs.

BRIAN HUNT, et al

Came to hand on the _____ day of _____, 20____, at _____ o'clock _____ M. Executed at _____
within the County of _____ at _____ o'clock _____ M. on the _____ day of _____
20____, by delivering to the within named _____

each in person, a true copy of this Citation together with the accompanying copy of this pleading, having first endorsed on same date of delivery. The distance actually traveled by
me in serving such process was _____ miles and my fees are as follows: To certify which witness my hand.

For serving Citation \$ _____
For mileage \$ _____ of _____ County, _____
For Notary \$ _____ By _____ Deputy

(Must be verified if served outside the State of Texas.)

Signed and sworn to by the said _____ before me this _____ day of _____, 20____,
to certify which witness my hand and seal of office.

Notary Public _____ County _____

RETURN / AFFIDAVIT
PROOF / ATTACHED

CAUSE NO. DC-21-04367

TROY MONTGOMERY,	§	IN THE DISTRICT COURT
	§	
PLAINTIFF,	§	
	§	
VS.	§	
	§	116 TH JUDICIAL DISTRICT
BRIAN HUNT AND KLLM TRANSPORT	§	
SERVICES, LLC	§	
	§	
DEFENDANTS.	§	DALLAS COUNTY, TEXAS

DEFENDANTS BRIAN HUNT AND KLLM TRANSPORT SERVICES, LLC'S
ORIGINAL ANSWER TO PLAINTIFF'S ORIGINAL PETITION
AND DEMAND FOR JURY TRIAL

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Brian Hunt and KLLM Transport Services, LLC, Defendants in the above-styled and numbered cause, and files this, their Original Answer to Plaintiff's Original Petition and Demand for Jury Trial, and would respectfully show the Court the following:

I.

GENERAL DENIAL

Defendants generally deny each and every, all and singular, the material allegations contained in the Plaintiff's Original Petition and, being allegations of fact, demands that the Plaintiff be required to prove such allegations by a preponderance of the evidence if the Plaintiff can so do.

II.

DEMAND FOR JURY TRIAL

Defendants hereby demand a trial by jury and submits the appropriate jury fee.

III.

Defendants requests Level III Discovery Plan.

WHEREFORE, PREMISES CONSIDERED, Defendants pray that Plaintiff takes nothing by this suit; and that Defendants go hence without delay and recover all costs expended in Defendants' behalf. Praying further, Defendants pray for such other and further relief, either at law or in equity, to which Defendants may be justly entitled.

Respectfully submitted,

CHAMBLEE RYAN, P.C.



By: _____

Jeffrey W. Ryan
State Bar No. 17469600
jryan@cr.law

2777 Stemmons Freeway, Suite 1257
Dallas, Texas 75207
(214) 905-2003
(214) 905-1213 (Facsimile)

ATTORNEY FOR DEFENDANTS
Brian Hunt and KLLM Transport Services,
LLC

CERTIFICATE OF SERVICE

I do hereby certify that on May 21, 2021 a true and correct copy of the above and foregoing document has been served via the court's e-file/e-service system to all counsel of record.

E-filing: eService@benabbot.com

James Bauguss, III
Ben Abbott & Associates, PLLC
1934 Pendleton Drive
Garland, Texas 75041



Jeffrey W. Ryan

Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Veronica Davila on behalf of Jeffrey Ryan
 Bar No. 17469600
 vdavila@cr.law
 Envelope ID: 53670973
 Status as of 5/24/2021 12:16 PM CST

Associated Case Party: TROY MONTGOMERY

Name	BarNumber	Email	TimestampSubmitted	Status
James Bauguss III		eService@benabbott.com	5/21/2021 8:37:07 AM	SENT

Associated Case Party: KLLM TRANSPORT SERVICES, LLC

Name	BarNumber	Email	TimestampSubmitted	Status
Erin Blair		eblair@cr.law	5/21/2021 8:37:07 AM	SENT
Veronica Davila		vdavila@cr.law	5/21/2021 8:37:07 AM	SENT
Jarad Kent		jkent@cr.law	5/21/2021 8:37:07 AM	SENT
Jeffrey W. Ryan		jryan@cr.law	5/21/2021 8:37:07 AM	SENT
Brenda Weidner		bweidner@cr.law	5/21/2021 8:37:07 AM	SENT

CAUSE NO. DC-21-04367

TROY MONTGOMERY,	§	IN THE DISTRICT COURT
	§	
PLAINTIFF,	§	
	§	
VS.	§	
	§	116 TH JUDICIAL DISTRICT
BRIAN HUNT AND KLLM TRANSPORT	§	
SERVICES, LLC	§	
	§	
DEFENDANTS.	§	DALLAS COUNTY, TEXAS

DEFENDANTS BRIAN HUNT AND KLLM TRANSPORT SERVICES, LLC'S
ORIGINAL ANSWER TO PLAINTIFF'S ORIGINAL PETITION
AND DEMAND FOR JURY TRIAL

TO THE HONORABLE JUDGE OF SAID COURT:

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Respectfully submitted,

CHAMBLEE RYAN, P.C.



By: _____

Jeffrey W. Ryan
State Bar No. 17469600
jryan@cr.law

2777 Stemmons Freeway, Suite 1257
Dallas, Texas 75207
(214) 905-2003
(214) 905-1213 (Facsimile)

ATTORNEY FOR DEFENDANTS
Brian Hunt and KLLM Transport Services,
LLC

CERTIFICATE OF SERVICE

I do hereby certify that on May 21, 2021 a true and correct copy of the above and foregoing document has been served via the court's e-file/e-service system to all counsel of record.

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Jeffrey W. Ryan

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